

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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December 16, 2022

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**

**RE: United States v. Burgos-Hernandez et al.
22 Cr. 133 (JGK)**

John G. Koeltl
12/16/22
John G. Koeltl, U.S.D.J.

Dear Judge Koeltl:

I write on behalf of my client, Franklin Bello Jimenez, in the above-captioned matter, to respectfully request that the Court modify Mr. Bello Jimenez's bail conditions to allow him to travel to Boston, MA to visit his family for the holidays on December 24, 2022 through December 25, 2022. Pretrial services and the government do not object to this request.

On February 17, 2022, Magistrate Judge Gabriel W. Gorenstein released Mr. Bello Jimenez on his own signature and imposed the following bail conditions: a \$25,000 personal recognizance bond cosigned by two financially responsible persons; travel limited to the SDNY/EDNY; surrender all travel documents with no new applications; pretrial supervision as directed by pretrial services; maintain or seek employment; no contact with co-defendants except in the presence of counsel; no new loans or lines of credit without prior approval from pretrial services. Mr. Bello Jimenez's bail conditions were timely satisfied.

For the past ten months, Mr. Bello Jimenez has remained compliant with the conditions of release. On August 10, 2022, the Court granted Mr. Bello Jimenez a temporary bail modification to travel to visit his mother on Sunday, August 14. The Court has since granted Mr. Bello Jimenez's application to travel to visit his mother on Saturday, October 15. Mr. Bello Jimenez now seeks permission to travel to visit family on December 24, 2022, returning December 25, 2022 at an address in Boston, MA to be provided to pretrial. Pretrial services and the government do not object to this request.

Thank you for your consideration of this request.

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Respectfully submitted,

/s/

Marne L. Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:

HONORABLE JOHN G. KOELTL
United States District Judge

cc: Sarah Kushner, Assistant U.S. Attorney